

EXHIBIT "3"

McCORRISTON MILLER MUKAI MacKINNON LLP

DAVID J. MINKIN 3639-0

LISA W. CATALDO 6159-0

Five Waterfront Plaza, 4th Floor

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Honolulu, Hawaii 96813

Telephone: (808) 529-7300

Facsimile: (808) 524-8293

Email: minkin@m4law.com

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JAN 09 2003

at 4 o'clock and 08 min. P.M.
WALTER A. Y. H. CHINN, CLERK

Attorneys for Plaintiffs Trustees
of the Hawaii Carpenters Trust Funds

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST) CIVIL NO. CV02-00425 DAE BMK
FUNDS, (Health & Welfare Fund)

by its trustees Albert) PLAINTIFF'S EX PARTE
Hamamoto, Audrey Hidano,) REQUEST TO CLERK FOR ENTRY
Henry Iida, Glen Kaneshige,) OF DEFAULT OF DEFENDANT;
Thomas Toma, Daniel Tom,) DECLARATION OF DAVID J.
Elmer Cabico, Paul C.K. Chang,) MINKIN; EXHIBIT "1"; ENTRY OF
Ronald Taketa, Melvin Fujii,) DEFAULT OF DEFENDANT;
Clifford Resacio, Russell Young) CERTIFICATE OF SERVICE
and Keith Hirota;)

Apprenticeship & Training Fund)

by its trustees James Ramirez,)

Russell Ogata, Conrad)

Murashige, Robert Donle,)

Angela Chinen, Dante Agra,)

Ron Taketa, Sidney Shimokawa,)

Dean Takahashi and Russell)

Hiranaka; *Vacation & Holiday*)

Fund by its trustees James)

Watanabe, James Ramirez,)

Gerard Sakamoto, Paul Sasaki,)

EXHIBIT " 3 "

Jiggs Tamashiro, Mark Erwin,)
Michael Spain, Jr., Rockwell)
Rogers, Jr., Curtis Kern, Patrick)
Borge, Sr. and Lloyd Kupau,)
Jr.; *Market Recovery Program* by)
its trustees Edmund Aczon,)
Thalia Choy, Steven Hidano,)
Claude Matsumoto, Gerard)
Sakamoto, Albert Belliveau,)
Michael Spain, Jr., Ronald)
Taketa, Glenn Young and Jason)
Orita; *Financial Security Fund*)
by its trustees Kenneth)
Sakurai, Gordon L. Scruton,)
James Watanabe, Conrad)
Murashige, Lance Wilhelm,)
Brian Hedge, Rockwell Rogers,)
Jr., Bruce Soileau, Ronald)
Taketa, Tim McCormack,)
Kenneth Spence, Jack Reeves)
and Ralph Yackley),)

Plaintiffs,)

vs.)

DYNAMIC INTERIORS, INC., a)
Hawaii corporation,)

Defendant.)

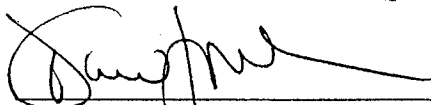
**PLAINTIFF'S EX PARTE REQUEST TO CLERK FOR
ENTRY OF DEFAULT OF DEFENDANT**

Plaintiff **HAWAII CARPENTERS TRUST FUNDS**, by its
trustees, et al. (hereinafter "HCTF") by and through its attorneys,

McCorriston Miller Mukai MacKinnon LLP, hereby requests that the Clerk of the above-entitled Court enter the default of Defendant **DYNAMIC INTERIORS, INC.**, a Hawaii corporation (hereinafter "Dynamic Interiors"), for failure to plead in response to or otherwise defend against Plaintiff's Complaint, as more fully set forth in the attached Declaration.

This request is made pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, the Declaration of David J. Minkin and Exhibit attached hereto and made a part hereof by reference, and the records and files herein.

DATED: Honolulu, Hawaii, JAN - 9 2003.

A handwritten signature in black ink, appearing to read "David J. Minkin", is written over a horizontal line.

DAVID J. MINKIN
LISA W. CATALDO

Attorneys for Plaintiff
HAWAII CARPENTERS TRUST FUNDS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST) CIVIL NO. CV02-00425 DAE BMK
FUNDS, (Health & Welfare Fund))
by its trustees Albert) DECLARATION OF DAVID J.
Hamamoto, Audrey Hidano,) MINKIN
Henry Iida, Glen Kaneshige,)
Thomas Toma, Daniel Tom,)
Elmer Cabico, Paul C.K. Chang,)
Ronald Taketa, Melvin Fujii,)
Clifford Resacio, Russell Young)
and Keith Hirota;)
Apprenticeship & Training Fund)
by its trustees James Ramirez,)
Russell Ogata, Conrad)
Murashige, Robert Donle,)
Angela Chinen, Dante Agra,)
Ron Taketa, Sidney Shimokawa,)
Dean Takahashi and Russell)
Hiranaka; *Vacation & Holiday*)
Fund by its trustees James)
Watanabe, James Ramirez,)
Gerard Sakamoto, Paul Sasaki,)
Jiggs Tamashiro, Mark Erwin,)
Michael Spain, Jr., Rockwell)
Rogers, Jr., Curtis Kern, Patrick)
Borge, Sr. and Lloyd Kupau,)
Jr.; *Market Recovery Program* by)
its trustees Edmund Aczon,)
Thalia Choy, Steven Hidano,)
Claude Matsumoto, Gerard)
Sakamoto, Albert Belliveau,)
Michael Spain, Jr., Ronald)
Taketa, Glenn Young and Jason)
Orita; *Financial Security Fund*)
by its trustees Kenneth)

Sakurai, Gordon L. Scruton,)
James Watanabe, Conrad)
Murashige, Lance Wilhelm,)
Brian Hedge, Rockwell Rogers,)
Jr., Bruce Soileau, Ronald)
Taketa, Tim McCormack,)
Kenneth Spence, Jack Reeves)
and Ralph Yackley),)
)

Plaintiffs,)
)

vs.)
)

DYNAMIC INTERIORS, INC., a)
Hawaii corporation,)
)

Defendant.)
)

DECLARATION OF DAVID J. MINKIN

David J. Minkin, hereby declares as follows:

1. I am an attorney licensed to practice law in all courts of the State of Hawaii.
2. I am an attorney with the firm of McCorriston Miller Mukai MacKinnon LLP, attorneys for Plaintiff Hawaii Carpenters Trust Funds ("HCTF") in the above-entitled matter.
3. I have personal knowledge of the matters set forth herein except and unless stated to be upon information and belief.

4. The Complaint and Summons in this action was served upon Defendant Dynamic Interiors in accordance with Rule 4 of the Federal Rules of Civil Procedure.

5. Defendant Dynamic Interiors was served on July 12, 2002. A true and correct copy of the Return and Acknowledgment of Service is attached hereto as Exhibit "1".

6. In accordance with Rule 12(a) of the Federal Rules of Civil Procedure, Defendant Dynamic Interiors' Answer or other response to the Complaint was due on or before August 1, 2002.

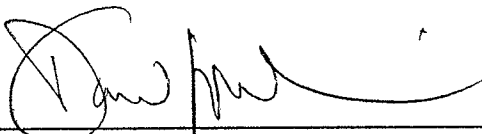
7. Following negotiations and conversations with the President of Dynamic Interiors, a settlement proposal was sent to Defendant Dynamic Interiors on November 26, 2002 for execution and prompt return.

8. Defendant Dynamic Interiors has not returned said settlement agreement nor called regarding the terms and conditions previously discussed and agreed to by the parties.

9. Defendant Dynamic Interiors did not answer nor otherwise respond to the Complaint, and the time to answer was not extended.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Honolulu, Hawaii, JAN - 9 2003.



DAVID J. MINKIN

McCORRISTON MILLER MUKAI MacKINNON LLP

DAVID J. MINKIN 3639-0
LISA W. CATALDO 6159-0
Five Waterfront Plaza, 4th Floor
500 Ala Moana Boulevard
Honolulu, Hawaii 96813
Telephone: (808) 529-7300

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 3 0 2002
3 20 p
at 3 o'clock and 20 min. M
WALTER A. Y. H. CHINN, CLERK

Attorneys for Plaintiffs Trustees
of the Hawaii Carpenters Trust Funds

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST FUNDS,)
(*Health & Welfare Fund* by its trustees)
Albert Hamamoto, Audrey Hidano, Henry)
Iida, Glen Kaneshige, Thomas Toma,)
Daniel Tom, Elmer Cabico, Paul C.K.)
Chang, Ronald Taketa, Melvin Fujii,)
Clifford Resacio, Russell Young and)
Keith Hirota; *Apprenticeship & Training*)
Fund by its trustees James Ramirez,)
Russell Ogata, Conrad Murashige,)
Robert Donle, Angela Chinen, Dante)
Agra, Ron Taketa, Sidney Shimokawa,)
Dean Takahashi and Russell Hiranaka;)
Vacation & Holiday Fund by its trustees)
James Watanabe, James Ramirez,)
Gerard Sakamoto, Paul Sasaki, Jiggs)
Tamashiro, Mark Erwin, Michael Spain,)
Jr., Rockwell Rogers, Jr., Curtis Kern,)
Patrick Borge, Sr. and Lloyd Kupau, Jr.;)
Market Recovery Program by its trustees)
Edmund Aczon, Thalia Choy, Steven)
Hidano, Claude Matsumoto, Gerard)
Sakamoto, Albert Belliveau, Michael)
Spain, Jr., Ronald Taketa, Glenn Young)
and Jason Orita; *Financial Security Fund*)
by its trustees Kenneth Sakurai, Gordon)
L. Scruton, James Watanabe, Conrad)

CIVIL NO. 02-00425 DAE BMK

RETURN AND ACKNOWLEDGMENT
OF SERVICE

Murashige, Lance Wilhelm, Brian Hedge,)
 Rockwell Rogers, Jr., Bruce Soileau,)
 Ronald Taketa, Tim McCormack,)
 Kenneth Spence, Jack Reeves and)
 Ralph Yackley),)

Plaintiffs,)

vs.)

DYNAMIC INTERIORS, INC., a Hawaii)
 corporation,)

Defendant.)

RETURN AND ACKNOWLEDGMENT OF SERVICE

I certify that I served the documents listed below by delivering a certified copy of each document to the person at the time, date and place shown. Receipt of the documents has been acknowledged by those persons by their signature.

DOCUMENT: Complaint; Exhibits "A" - "B"; Summons and Order Setting Rule 16 Scheduling Conference

Name of Person Served	Date, Time, and Place Served	Acknowledgement of Person Served (Signature)
Dynamic Interiors Inc	7-12-02 at 1715 hrs	
via: Michael Mendoza	4137 Likini St Hon 96818	

Michael E. Mendoza

7-12-02

Albert Cabatingan
 Process Server 391-6338

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST) CIVIL NO. CV02-00425 DAE
FUNDS, (Health & Welfare Fund)) BMK
by its trustees Albert)
Hamamoto, Audrey Hidano,) ENTRY OF DEFAULT OF
Henry Iida, Glen Kaneshige,) DEFENDANT
Thomas Toma, Daniel Tom,)
Elmer Cabico, Paul C.K. Chang,)
Ronald Taketa, Melvin Fujii,)
Clifford Resacio, Russell Young)
and Keith Hirota;)
Apprenticeship & Training Fund)
by its trustees James Ramirez,)
Russell Ogata, Conrad)
Murashige, Robert Donle,)
Angela Chinen, Dante Agra,)
Ron Taketa, Sidney Shimokawa,)
Dean Takahashi and Russell)
Hiranaka; *Vacation & Holiday*)
Fund by its trustees James)
Watanabe, James Ramirez,)
Gerard Sakamoto, Paul Sasaki,)
Jiggs Tamashiro, Mark Erwin,)
Michael Spain, Jr., Rockwell)
Rogers, Jr., Curtis Kern, Patrick)
Borge, Sr. and Lloyd Kupau,)
Jr.; *Market Recovery Program* by)
its trustees Edmund Aczon,)
Thalia Choy, Steven Hidano,)
Claude Matsumoto, Gerard)
Sakamoto, Albert Belliveau,)
Michael Spain, Jr., Ronald)

Taketa, Glenn Young and Jason)
Orita; *Financial Security Fund*)
by its trustees Kenneth)
Sakurai, Gordon L. Scruton,)
James Watanabe, Conrad)
Murashige, Lance Wilhelm,)
Brian Hedge, Rockwell Rogers,)
Jr., Bruce Soileau, Ronald)
Taketa, Tim McCormack,)
Kenneth Spence, Jack Reeves)
and Ralph Yackley),)

Plaintiffs,)

vs.)

DYNAMIC INTERIORS, INC., a)
Hawaii corporation,)

Defendant.)
_____)

ENTRY OF DEFAULT OF DEFENDANT

It appearing that Defendant DYNAMIC INTERIORS, INC., a
Hawaii corporation, is in default for failure to plead or otherwise
defend as required by law,

Default is HEREBY ENTERED as against Defendant DYNAMIC
INTERIORS, INC., a Hawaii corporation, this 9th day of

January, 2003.

DATED: Honolulu, Hawaii, JAN 09 2003.

(S) WALLACE H. CHINN

CLERK OF THE ABOVE-ENTITLED COURT

Hawaii Carpenters Trust Funds v. Dynamic Interiors, Inc., a Hawaii corporation, Civil No. 02-00425 DAE BMK, U.S.D.C., ORDER GRANTING EX PARTE MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANT DYNAMIC INTERIORS, INC., a Hawaii corporation

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST) CIVIL NO. CV02-00425 DAE BMK
FUNDS, (*Health & Welfare Fund*)

by its trustees Albert) **CERTIFICATE OF SERVICE**

Hamamoto, Audrey Hidano,)

Henry Iida, Glen Kaneshige,)

Thomas Toma, Daniel Tom,)

Elmer Cabico, Paul C.K. Chang,)

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Kenneth Spence, Jack Reeves)
and Ralph Yackley),)
)
Plaintiffs,)
)
vs.)
)
DYNAMIC INTERIORS, INC., a)
Hawaii corporation,)
)
Defendant.)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a true and correct copy of the foregoing was duly served on each of the following at their last known address via U.S. mail, postage prepaid:

DYNAMIC INTERIORS, INC.
137 Likini Street
Honolulu, Hawaii 96818

DYNAMIC INTERIORS, INC.
904 Kohou Street, Room 103
Honolulu, Hawaii 96817

DATED: Honolulu, Hawaii, JAN - 9 2003.

A handwritten signature in black ink, appearing to read "David J. Minkin", written over a horizontal line.

DAVID J. MINKIN
LISA W. CATALDO

Attorneys for Plaintiff
HAWAII CARPENTERS TRUST FUNDS